

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JAMES D. JOHNSON, as next friend to  
Olivia Y., et al.**

**PLAINTIFFS**

**vs.**

**CIVIL ACTION NO.: 3:04-CV-251-TSL-FKB**

**PHIL BRYANT, as Governor  
of the State of Mississippi, et al.**

**DEFENDANTS**

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**JOINT MOTION FOR ENTRY OF A STIPULATED SECOND REMEDIAL ORDER**

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The parties file this Joint Motion for Entry of a Stipulated Second Remedial Order ("Motion") as contemplated by paragraph 6 of the July 23, 2015 Agreed Order Continuing the Hearing on Plaintiffs' Renewed Motion for Contempt (the "Agreed Order") [Dkt. 664 at 3-4] and in support of this Motion state as follows:

1. On July 23, 2015, this Court entered the Agreed Order directing that the parties negotiate a Court-enforceable Remedial Order based on the recommendations of the Final Organizational Analysis Report to be presented by Public Catalyst [Dkt. 664 at 3].
2. On December 22, 2015, this Court entered an Interim Remedial Order [Dkt. No. 671] based on the recommendations of the Final Organizational Analysis Report of Public Catalyst.
3. The parties have reached an agreement on a Stipulated Second Remedial Order based on the recommendations of the Final Organizational Analysis Report prepared by Public Catalyst and the provisions of the December 22, 2015 Interim Remedial Order [Dkt. No. 671]. The Stipulated Second Remedial Order is being submitted to the Court contemporaneously with the filing of this Motion.

4. Due to the self-explanatory nature of this Motion, the parties respectfully request that the Court waive any requirement that a supporting memorandum of law be filed.

WHEREFORE, PREMISES CONSIDERED, the parties jointly request that this Court enter the Stipulated Second Remedial Order and for such other and further relief, in law or in equity, to which they may be entitled.

Respectfully submitted, this the 10th day of May, 2016.

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**CERTIFICATE OF SERVICE**

I, Dewitt L. Fortenberry, Jr., do hereby certify that I have on this day, electronically filed a true and correct copy of the forgoing document with the Clerk of Court using the ECF system which sent notifications of such to counsel as follows:

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SO CERTIFIED, this the 10th day of May, 2016.

/s/ Dewitt L. ("Rusty") Fortenberry, Jr.